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Attorney for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF NEVADA,

Plaintiff,

vs.

MIRIAM ELIZABETH SUAREZ-
CONTRERAS (1), aka "Ella" aka "Liz",

Defendant.

Case No: 2:19-cr-0133-APG-VCF

**STIPULATION AND ORDER
TO CONTINUE SENTENCING
HEARING (First Request)**

IT IS HEREBY STIPULATED AND AGREED, Melanee Smith, Assistant United States Attorney, counsel for the United States of America, and; Richard E. Tanasi, Esq., counsel for Defendant Miriam Elizabeth Suarez- Contreras (1); that the **Sentencing Hearing** in the above-captioned matter, now scheduled for *September 21, 2022 at the hour of 10:30 a.m.*, be vacated and continued to a time convenient for the Court *after December 7, 2022*.

Pursuant to General Order No. 2007-04, this Stipulation is entered into for the following reasons:

1. All defendants have not yet entered a guilty plea, which is a factor in Ms. Suarez's potential sentence in this case given the group plea contemplated in her guilty plea agreement.

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2. Defense counsel needs more to prepare Presentence Report Objections, the sentencing memorandum, and for sentencing given the need to translate relevant communications from English to Spanish.

2. Defense Counsel is preparing for a trial likely to last from September 26, 2022 to November 4, 2022 in *United States v. Castro, et al 2:19-cr-295-GMN-NJK*.

2. Ms. Suarez is in custody and does not object to this continuance.

4. The additional time requested herein is not sought for purposes of delay.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

WHEREFORE, the parties respectfully request that this Honorable Court accept the Stipulation and enter an Order as set forth below, continuing the sentencing hearing for date convenient to the Court, after ***December 7, 2022***.

DATED this 27th day of August 2022.

/s/ Melanee Smith

Melanee Smith
 501 Las Vegas Blvd., South
 Suite 100
 Las Vegas, NV 89101
Attorney for the UNITED STATES

/s/ Richard Tanasi

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UNITED STATES DISTRICT COURT

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UNITED STATES OF NEVADA,
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MIRIAM ELIZABETH SUAREZ
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CASE NO.: 2:19-cr-0133-APG-VCF

ORDER ON STIPULATION

This matter coming before the Court on Stipulation to Continue Sentencing Hearing, the Court having considered the matter, and good cause showing, the Court accepts the Stipulation.

WHEREFORE, IT IS HEREBY ORDERED, that the **Sentencing Hearing** in the above-captioned matter, now scheduled for *September 21, 2022 at the hour of 10:30 a.m.*, be vacated and continued to December 28, 2022, at 9:00 a.m. in Courtroom 6C.


UNITED STATES DISTRICT JUDGE
DATED: 8/29/2022

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